

July 23, 2025

**VIA ECF**

Hon. Ona T. Wang  
U.S. District Judge for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: ***Status of Protective Order,***  
*In re OpenAI, Inc. Copyright Infringement Litigation*, No.1:25-md-03143;  
This Document Relates To: All Actions

Pursuant to the Court's July 16, 2025 Order (ECF 344), OpenAI and News Plaintiffs have resolved their dispute regarding the provision under the Protective Order related to AEO-designated documents that may not be shown to the identified News Executives.

Concurrent herewith, the parties have filed an amended Stipulated Protective Order—signed by all parties—that reflects the agreed-upon procedure in Paragraph 24(b).

Sincerely,

/s/ Tiffany Cheung

Tiffany Cheung (*pro hac vice*)  
Morrison & Foerster LLP  
Counsel for OpenAI Defendants

/s/ Davida Brook

Davida Brook (*pro hac vice*)  
Susman Godfrey L.L.P.  
Liaison Counsel for News Plaintiffs